

Headquarters U.S. Air

Force Contract Act (SCA)

Price Adjustment
(Air Force Perspective)



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Air Force Labor
Advisors Office
SAF/AQCK

[insert date]







- Agency Labor Advisors
- Price Adjustment Resources (Air Force)
- SCA Price Adjustment
- SCA Price Adjustment Elements
- SCA Price Adjustment Sample
- Questions



Agency Labor Advisors



Help



Providing public access to federal wage determinations and related information.

WDOL.gov is part of the Integrated Acquisition Environment, one of the E-Government initiatives in the President's Management Agenda. It is a collaborative effort of the Office of Management and Budget, Department of Labor, Department of Defense, General Services Administration, Department of Energy, and Department of Commerce.

HOME

Service Contract Act

- Selecting SCA WDs
- e98
- Archived WDs
- WDs due to be revised

Davis-Bacon Act

- Selecting DBA WDs
- Archived WDs
- WDs due to be rev

Related iniviniation

- Agency Labor Advisors
- Library

FAQ₅

DOL Wage and Hour Website

User Guide

Welcome to the Wage Determina OnLine Program!

This website provides a single location for federal contracting officers to use in obtaining appropriate Service Contract Act (SCA) and Davis-Bacon Act (DBA) wage determinations (WDs) for each official contract action. The website is available to the general public as well. Guidance in selecting WDs from this website is provided in the WDOL.gov User's Guide.

News and Updates...

» The DOL has announced the dates for the first in a series of Prevailing Wage Conferences to be held throughout the country at locations within each of their five regions. The first two sessions will be held in Washington in July. Please see their Information Sheet regarding these initial sessions.

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Agency Labor Advisors (cont'd)



List of Agency Labor Advisors

Chief Acquisition Officers Council (CAOC) Members

Department Of Defense Agencies

Air Force

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Agency Labor Advisors (cont'd)



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Agency Labor Advisors (cont'd)



Civilian Contracting Agencies (cont'd)

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Veterans Affairs (VA), Department of

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Price Adjustment Resources



AF Labor Advisor Public Website





Price Adjustment Resources (cont'd)





AF LABOR ADVISORS: DESKTOP GUIDES

- SAF/AQC Memo, 30 Nov 07
- Davis-Bacon Act (DBA), Feb 06
- . Service Contract Act (SCA), May 07
- Labor and Affirmative Action, Apr 05
- Price Adjustment, Jul 09

What we're discussing today

FAIR LABOR STANDARDS ACT & SERVICE CONTRACT ACT

Price Adjustment Guide

July 2009

The purpose of this guide is to provide assistance in calculating contract price adjustments resulting from changes in the Service Contract Act (SCA) minimum wage rates and fringe benefits or changes in the Fair Labor Standards Act (FLSA) minimum wage. This guide is not all-inclusive, is informational, and its use is optional.

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- 1.2 Incorporation of Wage Determinations
- 1.3 Claim Submission
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SCA Price Adjustment



- What is the Federal Acquisition Regulation (FAR) contractual authority for allowing a Service Contract Act (SCA) labor price adjustment?
 - FAR 52.222-43, Fair Labor Standards Act and Service Contract Act -- Price Adjustment (Multiple Year and Option Contracts) (Nov 2006)
 - (a) This clause applies to both contracts subject to area prevailing wage determinations and contracts subject to collective bargaining agreements.
 - (b) The Contractor warrants that the prices in this contract do not include any allowance for any contingency to cover increased costs for which adjustment is provided under this clause....

FAR 52.222-43
provides the authority
to adjust the contract
price for SCA-covered
labor; this clause can
only be included in
firm-fixed price
contracts or laborhour contracts

Note: highlighting used throughout this briefing is provided for emphasis and does not appear in the actual FAR text





- FAR 52.222-43 (cont'd)
 - (d) The contract price or contract unit price labor rates will be adjusted to reflect the Contractor's actual increase or decrease in applicable wages and fringe benefits to the extent that the increase is made to comply with or the decrease is voluntarily made by the Contractor as a result of:
 - (1) The Department of Labor wage determination applicable on the anniversary date of the multiple year contract, or at the beginning of the renewal option period.

Contractor must provide actual payroll data

Contracting Officer calculates the difference between the amount paid by the Contractor and the new Wage Determination (WD)

The period covered by the adjustment begins with the date the new WD is required by the terms of the contract – not the date of the WD





- FAR 52.222-43(d)(1) (cont'd)
 - For example, the prior year wage determination required a minimum wage rate of \$4.00 per hour. The Contractor chose to pay \$4.10. The new wage determination increases the minimum rate to \$4.50 per hour. Even if the Contractor voluntarily increases the rate to \$4.75 per hour, the allowable price adjustment is \$.40 per hour

If the Contractor chooses to pay more than the WD rates, the adjustment is based on what the Contractor ACTUALLY paid--NOT on the previous WD rates

Previous WD hourly rate: \$4.00/hr Contractor actual: \$4.10/hr New WD hourly rate: \$4.50/hr

Adjustment: \$.40/hr (4.50/hr - \$4.10/hr)





- What is allowed in the SCA labor price adjustment under FAR 52.222-43?
 - (e) Any adjustment will be limited to increases or decreases in wages and fringe benefits..., and the accompanying increases or decreases in social security and unemployment taxes and workers' compensation insurance, but shall not otherwise include any amount for general and administrative costs, overhead, or profit.

Certain tax
increases must
"accompany" (be
caused by) the WD
increase. The
clause provides no
relief from tax
increases from
other causes or tax
increases on a
Contractor's total
payroll





- General calculation of price adjustment
 - New minimum wage and/or Health and Welfare (H&W)
 - Minus (-) actual wage/H&W paid in previous contract period
 - Plus (+) change in payroll taxes and workers comp (on amount of increase, only)
 - Equals (=) the price adjustment
- Remember: no overhead (OH), general and administrative (G&A) or profit allowed under the authority of FAR 52.222-43(e)

\$15.00	(new wage)
- <u>14.50</u>	(previous wage paid)
.50	(wage increase)
+ .08	(H&W increase)
+ .12	(change in taxes)
\$.70/hr	(price adjustment)





Two Price Adjustment Methods

Forward Pricing Method

- Contractor claims an adjustment based on the projected impact of a new or revised WD
- The projection uses the employee hours in the prior contract period factoring in any known or expected changes to contract scope or work force

Most SCA labor price adjustments are done using the Forward Pricing Method

Actual Cost Method

• If the claim has been delayed until after the adjustment period is over, by either an approved extension to the 30-day requirement for filing or by delay in contract modification, the Contractor should use actual employee hours worked as the basis for the claim







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Price Adjustment Elements



Adjustment of wages

- Contractor provides actual wage rate information paid in the previous contract performance period
- Contracting Officer calculates the difference to the new WD rate from the actual rate previously paid by the Contractor (not necessarily the same as the minimum rate required by the previous WD)

FAR 52.222-43(d)
(1) specifically
states that the
Government's
adjustment will be
based on what the
Contractor actually
paid (provided it
was at least the
previous WD's
minimum)

Category	Actual Wage Paid by Contractor	Wage on Current WD	Increase
23023 - Env Tech III	\$22.89	\$23.59	.70/hr





Adjustment of Health & Welfare (H&W)

- Contractor may be required to provide data supporting the actual premiums paid in previous period
- If the H&W increase is paid directly to employees, it is considered taxable wages. The Contractor will incur an accompanying expense in FICA, WCI and possibly FUTA and SUTA
- If H&W is paid to a third-party provider, Contractor incurs no increase in payroll taxes so no FICA or WCI adjustment is due on the H&W increase

FICA and WCI adjustment are due on the H&W amount when H&W is paid directly to the employees.

No FICA or WCI adjustment is due on H&W amount if it is paid into an insurance plan.

Actual H&W Paid by Contractor	H&W on Current WD	Increase			
\$3.24/hr	\$3.35/hr	\$.11/hr			





Adjustment of Vacation

- A vacation adjustment is only appropriate if the revised WD changed the vacation benefit or entitlement criteria (if, for instance, the old WD stated "one week paid vacation after 1 year of service" and the new WD states "two weeks paid vacation after 1 year of service")
- No adjustment is permitted merely because an individual employee's seniority has increased his/her entitlement
- Vacation hours required by the WD may be included in the claim (applying the hourly wage and H&W increase to the vacation hours)

Typical hours/year:

Productive Hrs: 1,920 Vacation: 80 Holidays: 80

Vacation required by the WD is found in the notes following the WD classifications (or in the CBA)





Adjustment of Holidays

- When the revised WD increases the number of required holidays, the Contractor may generally claim an adjustment for the increased cost
- The adjustment is the SCA minimum wage rate times the number of increased holiday hours (generally, eight hours per each new holiday for a full-time employee)
- Holiday hours required by the WD may be included in the claim (applying the per hour wage and H&W increase to the holiday hours)

The total number of holidays required by the WD is found in the notes following the WD classifications (or in the CBA)





Adjustment of Unemployment Taxes

- The Federal Unemployment Tax Act (FUTA) and State Unemployment Tax Act (SUTA) payments are normally not affected by a WD revision
- Unemployment taxes are paid by Contractors on wages up to a specific annual ceiling or cap
- The current FUTA rate of .8% is only paid on wages up to a cap of \$7,000 (\$56/yr); Contractors should have included this in their initial offers
- SUTA caps vary by state, but only 14 states use caps exceeding \$20,000. Rates vary by state and by employer, but the maximum SUTA rate is 5.4%
- SUTA websites can be reached through

STATE	2009 WAGE BASE	2008 WAGE BASE	2007 WAGE BASE	2006 WAGE BASE	
Alabama	\$8,000	\$8,000	\$8,000	\$8,000	
Alaska	32,700	31,300	30,100	28,700	
Arizona	7,000	7,000	7,000	7,000	Sample data on
Arkansas	10,000	10,000	10,000	10,000	•
California	7,000	7,000	7,000	7,000	SUTA bases
Colorado	10,000	10,000	10,000	10,000	
Connecticut	15,000	15,000	15,000	15,000	
Delaware	10,500	10,500	8,500	8,500	
District of Columbia	9,000	9,000	9,000	9,000	
Florida	7,000	7,000	7,000	7,000	
Georgia	8,500	8,500	8,500	8,500	
Hawaii	13,000	13,000	35,300	34,000	
Idaho	33,200	32,200	30,200	29,200	
Illinois	12,300	12,000	11,500	11,000	
Indiana	7,000	7,000	7,000	7,000	
lowa	23,700	22,800	22,000	21,300	
Kansas	8,000	8,000	8,000	8,000	
Kentucky	8,000	8,000	8,000	8,000	
Louisiana	7,000	7,000	7,000	7,000	
Maine	12,000	12,000	12,000	12,000	
Maryland	8,500	8,500	8,500	8,500	
Massachusetts	14,000	14,000	14,000	14,000	
Michigan	9,000	9,000	9,000	9,000	
Minnesota	26,000	25,000	24,000	24,000	
Mississippi	7,000	7,000	7,000	7,000	
Missouri	12,500	12,000	11,000	11,000	

Source:





Adjustment of Unemployment Taxes (cont'd)

- Since annual employee wages usually exceed the caps in most states without regard to the revised WD, typically no additional FUTA or SUTA is required-- the Contractor is already paying the maximum tax
- The contract price is not adjusted for changes in the FUTA or SUTA <u>rate</u>; if an adjustment is warranted, the current rates apply
- Contracting Officer verifies the applicable SUTA rate by requesting suitable documentation from the Contractor or contacting the relevant state employment tax office
- If an adjustment is due, it is only for the FUTA/SUTA percent rate times the wage rate differential





- No adjustment is allowed on General and Administrative (G&A) costs, overhead and profit
 - These elements are <u>specifically excluded</u> by FAR 52.222-43(e) and are not allowable as part of an SCA price adjustment
 - Increases in general liability insurance, state gross receipts taxes and bonding costs are also <u>not allowable</u> as part of an SCA adjustment (despite such costs being calculated based on total wages or total revenue)





No adjustment is allowed for employee reimbursements

- Employee expenses reimbursed by the Contractor, such as payment for fuel, mileage, meals, lodging, tool and uniform allowances and safety shoes, boots or gear, are not considered when calculating the hourly wage rate paid
- Such payments are considered as reimbursement of a Contractor's business expenses and not wages or fringe benefits
- These items must be excluded from any calculation for price adjustment under FAR 52.222-43





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SCA Price Adjustment Sample

Our SCA Labor Price Adjustment situation:

- 1. Environmental remediation project, fixed price, ABC Clean is the Contractor; location: Grissom ARB, IN
- 2. The wdol.gov wage determination* for the next option has been incorporated into the contract; it requires wage increases for the classifications used by the Contractor
- 3. The H&W rate also increases from \$3.16 to \$3.24/hour **. The wage determination is 05-2195, an odd number standard WD, therefore, the \$3.24 is due on all hours compensated up to a maximum of 40 hours per week

*If contract has a CBA WD, use rates found in the current CBA; methodology for doing the price adjustment is the same—just have to verify cost data with CBA rates and benefits (e.g., sick leave, vacation accrual, etc.)

** The H&W rate increased from \$3.24/hr to \$3.35/hr on 1 June 2009; awards on/after 1 June 2009 will use the \$3.35/hr rate.



- 4. Per FAR clause 52.222-43, the Contractor makes a claim for the increased cost
- 5. ABC Clean provides information which includes each employee's work hours, paid vacation and holiday hours, a "Defense Contract Audit Agency (DCAA) approved" overhead tax rate of 11.65%, the cost of new T-shirts for the employees (the contract required Contractor-identifiable clothing) and employee vehicle mileage reimbursement; the Contractor provided no payroll records
- 6. The Contractor claims the increase for the laborers, tractor operator, engineering tech I, environmental tech, lead environmental tech, payroll clerk, and the project manager; the lead environmental tech wage rate was never submitted to the Contracting Officer or to DOL for conformance (inclusion) via the SF1444



- Step-by-step, what does the Government do to evaluate this claim?
- What increased costs are required of the Contractor for SCA compliance?
- What accompanying costs are permitted by 52.222-43?

Step 1: Eliminate <u>unallowable costs</u>:

- Non-SCA employees: Payroll Clerk and Project Manager
- Non-wage/benefit costs: T-shirts, mileage
- 11.65% "DCAA-approved" tax rate



- Payroll information needed to calculate the SCA labor price adjustment from the previous year to the current year should be provided by the Contractor
- The authority to require this information is provided under FAR 52.222-43(g):
 - "(g) The Contracting Officer or an authorized representative shall have access to and the right to examine any directly pertinent books, documents, papers and records of the Contractor until the expiration of 3 years after final payment under the contract."

Step 2: What additional information is needed to evaluate?

- Payroll records showing actual wages and H&W
- Actual hours worked/paid
- How was H&W paid?
- What is the current workers comp rate?
- Were any employee wages previously less than the FUTA and/or SUTA caps?

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Step 3: Calculate:

Hint: Total all hours <u>paid</u> (work + holiday + vacation) in each classification.

		Hourly '	Wage	S		
Title (# of Employees)	Hours (2080/yr)	ual Rate (FY08)		05-2195 7 (FY09)	Delta/Hr	Total Wage Increase
Labor, Grnds Maint (10)	20,800	\$ 9.50	\$	10.00	\$ 0.50	\$ 10,400.00
Tractor Operator (1)	2,080	\$ 10.50	\$	11.75	\$ 1.25	\$ 2,600.00
Engr Tech I (1)	2,080	\$ 17.00	\$	18.15	\$ 1.15	\$ 2,392.00
Env Tech (5)	10,400	\$ 24.05	\$	25.25	\$ 1.20	\$ 12,480.00
Lead Env Tech (1)*	2,080	\$ 25.25	\$	26.30	\$ 1.05	\$ -
Total	37,440					\$ 27,872.00

*The Lead Env Tech classification was not conformed at a "lead" rate (see FAR 52.222-41(c)), therefore, no adjustment is due. The Lead Env Tech is being paid above the minimum requirement for Env Tech so there will be no adjustment to the wages (see FAR 52.222.43(d)).





- As a reminder, it is the Contractor's responsibility to conform a position to the WD (FAR 52.222-41(c) Compensation)
- (2)(i) If a wage determination is attached to this contract, the Contractor shall classify any class of service employee which is not listed therein and which is to be employed **under the contract** (i.e., the work to be performed is not performed by any classification listed in the wage determination) so as to provide a reasonable relationship (i.e., appropriate level of skill comparison) between such unlisted classifications and the classifications listed in the wage determination...
- Referred to as a "conformance"
- Accomplished via SF 1444
- Requires Contractor to conform wage determination within 30 days after the unlisted class of employee performs any contract work
- Contractor submits completed SF1444 (including employee agreement or disagreement) to the Contracting Officer
- Contracting Officer submits SF1444 to the DOL
- DOL approves/disapproves and returns to the Contracting Officer who forwards to the Contractor

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REQUEST FOR AUTHORIZATION OF ADDITIONAL CLASSIFICATION AND RATE

CHECK APPROPRIATE BOX
CHECK APPROPRIATE BOX SERVICE CONTRACT
CONSTRUCTION CONTRACT

OMB No.: **9000-0089** Expires: 04/30/2005

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the FAR Secretariat (MVP), Office of Acquisition Policy, GSA, Washington, DC 20405; and to the Office of Management and Budget, Paperwork Reduction Project (9000-0089), Washington, DC 20503.

INSTRUCTIONS: THE CONTRACTOR SHALL COMPLETE ITEMS 3 THROUGH 16, KEEP A PENDING COPY, AND SUBMIT THE REQUEST, IN QUADRUPLICATE, TO THE CONTRACTING OFFICER.

To:
 ADMINISTRATOR, Employment Standards Administration
 WAGE AND HOUR DIVISION
 U.S. DEPARTMENT OF LABOR
 WASHINGTON, D.C. 20210

2. FROM: (REPORTING OFFICE) 434 CONS/LGC 456 Main Street

Grissom ARB, IN 12345

3. CONTRACTOR ABC Clean

5. CONTRACT NUMBER

4. DATE OF REQUEST

20 Oct 2007

FA1234-07-C-1234 6. DATE BID OPENED (SEALED BIDDING)
N/A

3 Sep 2007

7. DATE OF AWARD

8. DATE CONTRACT WORK STARTED 1 Oct 2007

 DATE OPTION EXERCISED (IF APPLICABLE) (SCA ONLY)

10. SUBCONTRACTOR (IF ANY)

Complete if compliance is for the Subcontractor's employee(s)

11. PROJECT AND DESCRIPTION OF WORK (ATTACH ADDITIONAL SHEET IF NEEDED)

Provide a complete description of the project; can take from the title of the contract and introductory paragraph of the Performance Work Statement/Statement of Work

12. LOCATION (CITY, COUNTY AND STATE)

Grissom ARB, Bunker Hill, Miami County, Indiana

 IN ORDER TO COMPLETE THE WORK PROVIDED FOR UNDER THE ABO' INDICATED CLASSIFICATION(S) NOT INCLUDED IN THE DEPARTMENT 			ABLISH THE FOLLO	WING RATE(S) FOR THE			
NUMBER: 05-2195, Rev. 5	DATED:	08/15/2	2007				
a.LIST IN ORDER: PROPOSED CLASSIFICATION TITLE(S); JOB DESCRIPTION AND RATIONALE FOR PROPOSED CLASSIFICATIONS (SCA ONLY)	N(S); DUTIES;	b. WAGE F	RATE(S)	c. FRINGE BENEFITS PAYMENTS			
(Use reverse or attach additional sheets, if necessary)							
Lead Environmental Technician							
The Lead Environmental Technician conducts test investigations to obtain data for use by environmental methods of controlling pollutants in air, water utilizing knowledge of agriculture, chemistry, met and engineering principles and applied technolog Reviews and approves all reports and data provid Environmental Technicians I and II. This worker conducts chemical and physical labor	ental, ng sources r, and soil, eorology, ies. ed by	\$19. 56		\$3.2 4			
field tests according to prescribed standards to de characteristics or composition of solid, liquid, or g materials and substances, using pH meter, chemi autoclaves, centrifuge spectrophotometer, micros	etermine Jaseous Cals, Scope,						
97 SIZNATURE AND THE OF SUBCONTRACTOR REPRESENTATIVE atometer (IF ANY)	15. SIGNATURE AND	TITLE OF PRIME C	ONTRACTOR REPRI	ESENTATIVE			
Must be completed, if applicable	Mus	st be comp	leted				
16. SIGNATURE OF EMPLOYEE OR REPRESENTATIVE	TITLE		CHECK APPROPRIATE	BOX-REFERENCING BLOCK 13.			
Must be signed by the EMPLOYEE or union rep, if applicable	Employee Title	's Job	AGREE	EE DISAGREE			
	•	Must I	he marked h	ov the FMPI OYFF			



FOR THIS EXERCISE:

- The contractor documents that H&W was paid to a third-party provider
- So, no accompanying costs are due on the H&W increase

Step 4: Was health and welfare paid in cash to the employees or paid to a third-party provider?

If cash: calculate accompanying costs on H&W total

If third-party provider:
do not calculate
accompanying costs of the H&W
total



Hourly Wages

		Hourry					
Title (# of Employees)	Hours (2080/yr)	tual Rate d (FY08)	05-2195 7 (FY09)	Delta/Hr	Total Wage Increase	Hé	&W (\$.08/hr)
Labor, Grnds Maint (10)	20,800	\$ 9.50	\$ 10.00	\$ 0.50	\$ 10,400.00	\$	1,664.00
Tractor Operator (1)	2,080	\$ 10.50	\$ 11.75	\$ 1.25	\$ 2,600.00	\$	166.40
Engr Tech I (1)	2,080	\$ 17.00	\$ 18.15	\$ 1.15	\$ 2,392.00	\$	166.40
Env Tech (5)	10,400	\$ 24.05	\$ 25.25	\$ 1.20	\$ 12,480.00	\$	832.00
Lead Env Tech (1)	2,080	\$ 25.25	\$ 26.30	\$ 1.05	\$ -	\$	166.40
Total	37,440				\$ 27,872.00	\$	2,995.20



Step 5: Calculate accompanying costs:

- FICA (6.20% for Security + 1.45% for Medicare)
- Workers Compensation Insurance (Contractor rate = \$4 per \$100 (4%))
- Federal Unemployment Tax Allowance (FUTA) (if applicable)
- State Unemployment Tax Allowance (SUTA) (if applicable)

		F	lourly V	Vag	es			_	_	
Title (# of Employees)	Hours (2080/yr)			219		Delta/H r	Total Wage Increase	H&W (\$.08/hr)	FICA (7.65%)*	WCI (4%)*
Labor, Grnds Maint (10)	20,800	\$	9.50	\$	10.00	\$ 0.50	\$ 10,400.00	\$ 1,664.00	\$ 795.60	\$ 416.00
Tractor Operator (1)	2,080	\$	10.50	\$	11.75	\$ 1.25	\$ 2,600.00	\$ 166.40	\$ 198.90	\$ 104.00
Engr Tech I (1)	2,080	\$	17.00	\$	18.15	\$ 1.15	\$ 2,392.00	\$ 166.40	\$ 182.99	\$ 95.68
Env Tech (5)	10,400	\$	24.05	\$	25.25	\$ 1.20	\$ 12,480.00	\$ 832.00	\$ 954.72	\$ 499.20
Lead Env Tech (1)*	2,080	\$	25.25	\$	26.30	\$ 1.05	\$ -	\$ 166.40	\$ -	\$ -
Total	37,440						\$ 27,872.00	\$ 2,995.20	\$ 2,132.21	\$ 1,114.88

^{*}FICA and WCI are not applied to H&W since H&W is paid to an insurance plan and not in cash

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Total SCA labor price adjustment due for the upcoming contract performance period: **\$34,114.29**

Hourly Wages													
	Hours	Actual	WD 05- 2195										
Title (# of Employees)	(2080/y r)	Rate Paid (FY08)	Rev 7 (FY09)	Deli	ta/Hr	Total Wage Increase		H&W (\$.08/hr)	FICA (7.65%) W	/CI (4%)	Amt	: Due
Labor, Grnds Maint		\$	\$			\$						\$	
(10)	20,800	9.50	10.00	\$	0.50	10,400.00	\$	1,664.00	\$ 795.60) \$	416.00	13,275	.60
		\$	\$			\$						\$	
Tractor Operator (1)	2,080	10.50	11.75	\$	1.25	2,600.00	\$	166.40	\$ 198.90) \$	104.00	3,069.3	30
		\$	\$			\$						\$	
Engr Tech I (1)	2,080	17.00	18.15	\$	1.15	2,392.00	\$	166.40	\$ 182.99) \$	95.68	2,837.0)7
		\$	\$			\$						\$	
Env Tech (5)	10,400	24.05	25.25	\$	1.20	12,480.00	\$	832.00	\$ 954.72	2 \$	499.20	14,765	.92
		\$	\$			\$ -							
Lead Env Tech (1)*	2,080	25.25	26.30	\$	1.05		\$	166.40	- \$	\$	-	\$	166.40
						\$	\$		\$	\$		\$	
Total	37,440					27,872.00	2,9	95.20	2,132.21	1,:	114.88	<mark>34,11</mark> 4	1.29









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